

**REMARKS****Claim Rejections Under 35 U.S.C. § 103**

Claims 1-4 and 6-14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Kuehnel et al. (U.S. Patent No. 5,787,077) in view of Jiang et al. (U.S. Patent No. 6,741,853 B1). Applicant respectfully traverses.

The Office Action asserts that Kuehnel et al. teaches the invention substantially as claimed including dynamic connection mapping in wireless ATM systems. Office Action, page 3, first paragraph. Applicant contends this is a mischaracterization of the teachings of the reference. Applicant is not claiming dynamic connection mapping, but is instead claiming a dynamic map of a wireless network comprising representations of a plurality of network devices depicting locations of the network devices relative to a reference point. *See, e.g.*, claim 1. Applicant contends that the dynamic mapping of the primary reference of Kuehnel et al. is a mapping of communication connectivity, and not locations of its devices relative to a reference point. *See*, Kuehnel et al., column 3, lines 1-13 (noting the mapping of ATM cells into a selected virtual path on a fixed link to a controller). Applicant has distinguished its physical mapping from such logical mapping concerned only with connectivity. *See*, Specification, paragraph 0020.

Claim 1 recites, in part, “representations of a plurality of network devices depicting locations of the network devices relative to a reference point.” As noted above, Applicant contends that Kuehnel et al. fails to teach or suggest representations of its network devices depicting their locations relative to a reference point. The Office Action cites Kuehnel et al., column 8, lines 52-56 and its Abstract as showing this limitation. However, these citations, and the reference as a whole, only refer to connectivity, and not to physical location. In fact, there is no mention of distance or relative location of Kuehnel et al.’s network devices anywhere in the cited reference.

Claim 1 further recites, in part, “wherein the representations comprise visual, audible and/or tactile indicators.” The Office Action cites Kuehnel et al., Figure 6 as showing this limitation. However, this is not a dynamic map as claimed in Applicant’s claim 1. Because

there is no indication as to location of the devices relative to a reference point, whether the drawing qualifies as a visual representation is irrelevant.

Claim 1 further recites, in part, “wherein the representations provide an indication of at least a relative distance between their respective network device and the reference point.” The Office Action cites Kuehnel et al. column 4, lines 59-62 and column 2, lines 25-36 as showing this limitation. However, there is no mention of distance or location in these citations or anywhere else in the cited reference. Kuehnel et al. is concerned with communication paths and does not purport to concern itself with the physical location of devices or their relative distance to a reference point.

Claim 1 further recites, in part, “a representation of a first network device of the plurality of network devices that is requesting a service on the wireless network,” “a representation of a second network device of the plurality of network devices that is capable of providing the requested service,” “wherein the representation of the first network device is highlighted to differentiate it from representations of other network devices,” and “wherein the representation of the second network device is highlighted to differentiate it from representations of other network devices that are incapable of providing the requested service.” The Office Action admits that Kuehnel et al. fails to teach these limitations, but cites the secondary reference of Jiang et al. to overcome the admitted deficiencies of the primary reference. Office Action, page 3, last paragraph and page 4, first paragraph.

However, Jiang et al. suffers the same deficiencies as the primary reference of Kuehnel et al. in that Jiang et al. does not deal with a dynamic map of a wireless network comprising representations of a plurality of network devices depicting locations of the network devices relative to a reference point.

Claim 1 recites, in part, “a representation of a first network device of the plurality of network devices that is requesting a service on the wireless network.” The Office Action cites Jiang et al., column 21, lines 23-26 as showing this limitation. However, Applicant notes that the cited section only discusses a process of receiving an information request and does not teach or suggest a visual, audible and/or tactile indicator of the device making a request.

Claim 1 further recites, in part, “a representation of a second network device of the plurality of network devices that is capable of providing the requested service.” The Office Action cites Jiang et al., column 21, lines 16-19 as showing this limitation. However, Applicant

notes that the cited section only discusses a method of providing information and does not teach or suggest a visual, audible and/or tactile indicator of the device providing the information.

Claim 1 further recites, in part, “wherein the representation of the first network device is highlighted to differentiate it from representations of other network devices.” The Office Action cites Jiang et al., column 5, lines 36-40 as showing this limitation. However, Applicant notes that the cited section only discusses methods to determine the type of the user’s device and format the requested information accordingly, and to detect the device type, adapt the content for the intended device and deliver the information. Applicant contends that the cited section, and the cited reference as a whole, fail to teach or suggest that a visual, audible and/or tactile indicator is highlighted to differentiate one representation of a network device from visual, audible and/or tactile indicators representing other network devices.

Claim 1 further recites, in part, “wherein the representation of the second network device is highlighted to differentiate it from representations of other network devices that are incapable of providing the requested service.” The Office Action cites Jiang et al., column 7, line 64 through column 8, line 7 as showing this limitation. However, Applicant notes that the cited section only discusses a network architecture. Applicant contends that the cited section, and the cited reference as a whole, fail to teach or suggest that a visual, audible and/or tactile indicator is highlighted to differentiate one representation of a network device from visual, audible and/or tactile indicators representing other network devices that are incapable of providing a requested service.

In view of the foregoing, Applicant contends that the primary reference of Kuehnel et al. and the secondary reference of Jiang et al. fail to teach or suggest any limitation of Applicant’s claim 1 in that they do not purport to concern dynamic maps of a wireless network comprising representations of a plurality of network devices depicting locations of the network devices relative to a reference point. In addition, because the secondary reference of Jiang et al. fails to teach or suggest limitations that the Office admits to be missing from the primary reference of Kuehnel et al., Applicant contends that the rejection under 35 U.S.C. § 103(a) must fail as the cited references, taken either alone or in combination, fail to teach or suggest each and every limitation of Applicant’s claim 1.

In view of the foregoing, Applicant contends that claim 1 is patentably distinct from the cited references, taken either alone or in combination. As claims 2-4 and 6-14 include all

patentable limitations of claim 1, these claims are also believed to be allowable. Applicant thus respectfully requests reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a), and allowance of claims 1-4 and 6-14.

CONCLUSION

In view of the above remarks, Applicant believes that all pending claims are in condition for allowance and respectfully requests a Notice of Allowance be issued in this case. Please charge any further fees deemed necessary or credit any overpayment to Deposit Account No. 08-2025.

If the Examiner has any questions or concerns regarding this application, please contact the undersigned at (612) 312-2204.

Respectfully submitted,

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